

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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JADENAE TRABACCHI,

Plaintiff,

-against-

THE DEPARTMENT OF EDUCATION OF THE CITY OF  
NEW YORK, MELISSA AVILES-RAMOS, Chancellor,  
and KATHERINE RODI, Director of Employee Relations,

**DECLARATION OF  
BRIGID LYNN IN  
SUPPORT OF  
DEFENDANT’S MOTION  
TO DISMISS THE  
AMENDED COMPLAINT**

No. 24 CV 6123(RPK)(TAM)

Defendants.

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**BRIGID LYNN** declares that the following is true and correct under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am an Assistant Corporation Counsel in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, attorney for Defendants in the above-captioned proceeding.

2. I respectfully submit this declaration in support of Defendants’ Motion to Dismiss the Amended Complaint.

3. Attached hereto as Exhibit “A” is a true and correct copy of the Martin F. Scheinman Impact Arbitration Agreement, dated September 10, 2021.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
December 12, 2025

**MURIEL GOODE-TRUFANT**  
Corporation Counsel of the  
City of New York  
Attorney for Defendants  
100 Church Street, Second Floor  
New York, New York 10007  
(212) 356-2481

By: /s/ Brigid Lynn

Brigid Lynn  
Assistant Corporation Counsel